



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

ACTION MEMORANDUM

SUBJECT: Request for a Removal Action at the Westgate Mobile Home Park Greer, South Carolina

FROM: Warren Dixon
On-Scene Coordinator

TO: Joseph R. Franzmathes
Director
Waste Management Division

I. Purpose

The purpose of this Action Memo is to request and document approval of the proposed removal action described herein for the Westgate Mobile Home Park site. The site is located in a residential area on Old Chick Spring Road in Greer, Greenville County, South Carolina. Soil within the trailer park is contaminated with lead. A request for \$375,000 is needed to conduct an immediate response action at the Westgate Mobile Home Park site, which meets the removal criteria of Section 300.415 of the National Contingency Plan (NCP).

II. SITE CONDITIONS AND BACKGROUND

The Westgate Mobile Home Park is located at 105 Old Chick Spring Road in Greer, Greenville County, South Carolina. The trailer park is approximately 5 acres in size with 52 residential trailers located within the trailer park area. The trailer park has been in the present location for 25 years and appears to be a lower income neighborhood within the city limits of Greer, South Carolina. Each trailer is placed on a concrete pad and is surrounded by a grassy area. The Westgate Mobile Home Park is bordered to the northeast by Wade Hampton Boulevard and to the southeast by the Exide Battery Company which is located at 109 Old Chick Spring Road.



10852412

A. Site Description

1. Removal site evaluation

The Westgate Mobile Home Park is approximately 5 acres in size and consists of approximately 52 single family residential trailer homes. Many of the families residing in the trailer park have small children that play throughout the trailer park. The trailer park consists of grassy areas throughout and has two asphalt streets. Each trailer appears to have its own parking area for the residents. The trailer park is also located within 50 yards of the Exide Battery facility which borders the site on the southeast.

2. Physical Location

The Westgate Mobile Home Park is located within the city limits of Greer, Greenville County, South Carolina. The main entrance of the trailer park is located on Old Chick Spring Road, one-tenth mile past the intersection of US 129. The trailer park is surrounded by a fence. Predominant features near the site are the Exide Battery plant building which covers approximately 12,000 square feet and the Bi-Low grocery store located on Wade Hampton Blvd. Both locations are within 50 yards of the Westgate Mobile Home Park.

3. Site Characteristics

The Westgate Mobile Home Park is a residential area that is 5 acres in size and consist of approximately 52 single family trailer homes. Lead contaminated soil has been identified within the trailer park. Any runoff from the trailer park flows in a northeast direction from the park into a drainage ditch along Old Chick Spring Road and enters Princess Creek which is 200 yards south of the trailer park.

4. Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant

On June 29, 1994, a total of 55 soil samples were collected from 52 residential locations within the Westgate Mobile Home Park. Soil samples were collected from the surface of each trailer lot location. The analytical data indicates that lead levels range from 32.1 ppm to 2110 ppm.

5. NPL Status

The Westgate Mobile Home Park is not on the National Priorities List. The site located approximately two miles from the Elmore Waste Disposal NPL Site. The Westgate Mobile Home Park site has been referred to the site assessment program for a site investigation.

6. Map, pictures and other graphic representation (See attachment 1)

B. Other Actions to Date

1. Previous Action

On June 29-30, 1994 the South Carolina Department of Health and Environmental Control (DHEC) and the Greenville County Health Department tested children and adults in the Westgate Mobile Home Park for lead. There has been no previous removal action at the Westgate Mobile Home Park.

2. Current Actions None

C. State and Local Authorities Roles

1. State and Local Authorities Roles

On January 28, 1992 the South Carolina DHEC collected soil samples from three different locations within the Westgate Mobile Home Park. The results of the samples indicated lead levels of 270 ppm, 560 ppm and 800 ppm. On April 14, 1994 a formal request from DHEC was made to EPA for a removal action at the Westgate Mobile Home Park because an unacceptable exposure risk for young children could exist at the trailer park. The City of Greer has not taken any actions at the Westgate Mobile Home Park.

2. Potential for continued State/local response

Neither the State of South Carolina nor the City of Greer has funds to address the removal action needed at the Westgate Mobile Home Park.

III. THREAT TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES.

Lead contaminated soil in the Westgate Mobile Home Park exceeds the clean-up levels that have been established for the Elmore Waste Disposal NPL Site which is located two miles from Westgate Mobile Home Park. Both locations are residential areas where adults and children live. The Westgate Mobile Home Park consists of approximately 52 single family mobile homes. On June 23, 1994, the South Carolina Division of Health Hazard Evaluation Office sent a letter to the residents of the Westgate Mobile Home Park informing them that previous soil sample results taken from the trailer park indicated that lead levels are high enough to pose a health concern. The residents were also told that free blood-lead testing for all adults and children would be given on June 29-30, 1994.

A. Threat to Public Health or Welfare

The lead contaminated soil in the Westgate Mobile Home Park poses a threat to the residents that live in the affected area where lead levels exceed the cleanup goal of 500 ppm that has been established for Elmore Waste Disposal Site which is two miles from the trailer park. Contaminated media at the site includes surface and shallow subsurface soil.

Residents that could be affected by the Westgate Mobile Home Park are adults and children that live in the mobile home park, as well as adults and children that live near the mobile home park that might visit or play in the contaminated area.

Currently, exposure to adults and children that live in the affected area of the mobile home park would be through incidental ingestion of the contaminated soil, ingestion of surface water from the mobile home park, and dermal contact. Dust from the contaminated area of the site could cause residents to inhale contaminants from the affected area.

B. Threat to the Environment

Any surface runoff from the trailer park would discharge to drainage along Old Chick Spring Road and into Princess Creek which is less than 200 yards from the trailer park. Princess Creek flows through the King Acres Subdivision and south for 3.7 miles to the Enoree River. In addition to the runoff from the Westgate Mobile Home Park, runoff from the Exide Battery Company has also contributed to the contamination of the groundwater beneath the King Acres subdivision.

There are no water intakes within 15 miles downstream of the trailer park and the Exide Battery facility. However there is livestock watering from surface water within 15 miles downstream of the both Westgate Mobile Home Park and the Exide Battery Company.

IV. ENDANGERMENT DETERMINATION

Actual or threatened runoff or discharge from the Westgate Mobile Home Park, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health or welfare or the environment.

V. PROPOSED ACTION AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

The removal action at the Westgate Mobile Home Park will require the excavation of lead contaminated soil where the lead levels exceed 500 ppm in the soil. The cleanup contractor will use a 10 or 15 foot grid pattern throughout each affected area in order to control the excavation of the soil. Each affected yard has been sampled in order to identify the areas that exceed 500 ppm of lead in the soil. After the contaminated soil is excavated, each yard will be backfilled with clean soil and reseeded. Because of the size of each yard, soil cannot be stockpiled daily to be made ready for shipment. Trucks to transport soil will be staged in front of each trailer during excavation. Additionally, work will be conducted during normal weekday working hours so that residents will not be displaced from their homes. EPA will coordinate closely with the residents in conducting this excavation. Contaminated soil will be transported to an approved disposal facility. EPA's primary concern is the health and safety of the contractor personnel on-site and residents in the affected area. The contractor will be required to develop a work plan to address the following:

- A. Grid pattern for each affected yard.
- B. Excavation of the soil in contaminated area.
- C. Loading of soil onto truck daily to be transported daily for disposal.

The work plan will be reviewed by EPA before the start of the removal action. The OSC will contact the off-site disposal coordinator for RCRA compliance status of any disposal facility per the Off-site Policy before transporting any waste material for disposal from the Westgate Mobile Home Park.

2. Contribution to remedial performance

All actions at the Westgate Mobile Home Park will be consistent with any remedial action that would be taken based on the site conditions. Some remedial activities to address contamination from Exide Battery Company may be conducted during the removal action at the Westgate Mobile Home Park but are not considered a part of this action.

3. Description of alternative technologies

Because of the Westgate Mobile Home Park location, no alternative technology is being considered. Excavation and off-site disposal of the contaminated soil is the only acceptable remedy at the present time.

4. Engineering evaluation / cost analysis (EE / CA)

Since this is a time critical removal, an EE/CA is not applicable for this action.

5. Applicable or Relevant and Appropriate Requirement (ARAR's)

Federal ARAR's applicable to this site may include the Resource Conservation Recovery Act (RCRA) and implementing regulations. Depending on the nature of the soil contamination, State Solid Waste disposal laws and regulations may be an ARAR.

6. Project Schedule

The proposed work at the Westgate Mobile Home Park will begin August 11, 1994. The work will be performed in several phases. Phase I will consist of excavation of all contaminated soil on site; phase II will be the backfilling with clean soil; and the phase III will be the reseeding and possible landscaping of the affected areas to ensure proper vegetative covering. The removal action is expected to take 10 to 15 days to complete the excavation, backfilling and the reseeding.

B. Estimated Costs**Extramural Cost**

Extramural Cleanup Contractor	\$ 285,000
20% Contingency	\$ 57,000
Extramural Subtotal	\$ 342,000
TAT Cost	\$ 16,000
CLP Analytical	\$ 0
ERT / REAC	\$ 0
 Total Extramural Cost	 \$ 358,000

Intramural Cost

Intramural Direct Cost (\$ 30.00 labor/300 hr)	\$ 9,000
Intramural Indirect Cost (\$ 54.00 labor /150 hr)	\$ 8,000
 Total Project Ceiling	 \$ 375,000

VI. EXPECTED CHANGES IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

If removal action is not taken or delayed at the Westgate Mobile Home Park, the residents will continue to be exposed to lead levels up to 2110 ppm in the trailer park where they live. There is a great probability for children to incidentally ingest or inhale the soil while playing in the trailer park that is contaminated with lead.

VII. OUTSTANDING POLICY ISSUES

None

VIII. ENFORCEMENT

EPA's Office of Regional Counsel has no on-going enforcement action for the Westgate Mobile Home Park at the present time.

However; EPA's Cost Recovery Section will assign a civil investigator to investigate the Exide Battery Company to determine if the lead contaminated soil at the trailer park has any connection with their past or present operations at the Exide Battery facility. Because of the critical nature of this site, this removal action cannot be delayed for an extensive protracted negotiation with any PRPs subsequently identified.

IX. RECOMMENDATION

The conditions at the Westgate Mobile Home Park meet the NCP section 300.415(b)(2) criteria for a removal action and I recommend your approval of the proposed removal action. The total project ceiling, if approved, will be \$375,000. Of this an estimated \$285,000 comes from the Regional removal allowance.

Approved: _____ Date: _____

Disapproved: _____ Date: _____

Joseph R. Franzmathes
Director
Waste Management Division

Attachment

CC: Keith Lindler, SCDHEC

W.Dixon:4WD-ERRB/3931/8-08-94/Dixon-WESTGATE

MAN 8/10/94
for W.Dixon
4WD/OSC

RDG
R.Green
4WD/SUPERFUND
Gidax

MAN 8/10/94
M.Norman
4WD/ERS

ROB
J.Franzmathes
4WD
A.olar

M.D.Lair 8/10/94
M.D.Lair
4WD/ERRB